IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF: :
                                                     :
                                                     :
                                                     :
DEBTOR (S)   :   CASE NO: (GAC)
                                                     :
                                                     :   CHAPTER
                                                     :
MOVANT   :   INDEX
                                                     :
                                                     :
                                                     :
RESPONDENT (S)   :
                                                     :
                                                     :

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NOTICE OF MOTION FOR RELIEF FROM STAY UNDER II U.S.C. §362

  To the above named respondent (s):

   You are hereby notified that on _____ **the above named movant (s) filed a Motion Seeking relief from the Automatic Stay under U.S.C. §362.**

   Service of the motion and notice shall be made within three (3) days after issuance of the notice. A certificate of service must be file forthwith, but not later than five (5) days after service is done. If the certificate of service is not timely filed, the Court may deny the motion for failure to give notice within three (3) days from issuance.

   You must file an answer to the motion within eleven (11) days from the service of this notice, and serve such answer upon movant or his attorney _____ **whose address is**
_____

IF YOU FAIL TO TIMELY ANSWER AS SET FORTH HEREIN, AN ORDER MAY BE ENTERED AGAINST YOU GRANTING THE RELIEF REQUESTED BY THE MOVANT.

   If a timely answer is filed, then _____ **at** _____ **at the United States Bankruptcy Court, U.S. Post Office and Courthouse Bldg., 300 Recinto Sur., 3rd Floor, Courtroom 3, Old San Juan, PR , is fixed as the time and place for the hearing on such motion.**

                CELESTINO MATTA-MENDEZ, CLERK
                United States Bankruptcy Court

                By:_____

Date of Issuance:_____

Local Bankruptcy Rules for the District of Puerto Rico effective July 1, 1988 has established the following procedure for Motions Requesting Lifting of the Automatic Stay

It appearing that pursuant to the provisions of §362 of the Bankruptcy Code, the Court is required to conduct prompt hearing with respect to motion for relief from the automatic stay and it further appearing that it is necessary to enter certain order to permit the Court to conduct the aforesaid prompt hearings, the following procedures shall govern motion filed under 11 U.S.C. §362

1. Service of the Motion and of a Notice to substantially conform with Local Form No 8 shall be made within three (3) days after issuance of the notice

2. The respondent shall file an answer within eleven (11) days after the issuance of the notice

3. The specific date for the preliminary hearing is set forth in the notice.

4. Pursuant to §362 (e) of the Code, the hearing date specified in the notice may be a preliminary hearing or may consolidated with the final hearing , as shall be determined by the Court.

5. Together with any motion requesting relief from the automatic stay, movant shall file with the Court the following supporting exhibits and documents.:

   a. True copies of all notes, bonds, mortgages, security agreemnts, financing agreements, assignments and any other document upon which the movant will rely athe hearing

   b. A detailed report of any appraiser whose testimony is to be presented at the hearing. Said detail report shall include the qualifications of the appraiser, the factual basis for the appraisal, including comparable sales if utilized and the method of appraisal.

   c. A statement of amount due including a breakdown of the following categories:
      1. Unpaid principal
      2. Accrued interest from a specific sate to a specific date
      3. Late charges from a specific date to a specific date
      4. Attorney's fees
      5. Advances for taxes, insurance and the like
      6. Unearned interest
      7. Any other charges
      8. A per diem interest factor

6. Three (3) days prior to the preliminary hearing, the respondent shall file with the Court and deliver to movant or his attorney, if so represented, a detailed report of any appraiser whose testimony is to be presented at the hearing. Said detailed report shall include the qualifications of the appraiser, the factual basis for the appraisal including comparable sales if utilized and the method of appraisal. In addition, he shall also file a copy of any other document that he intends to use at the hearing.

7. If the motion is contested, the attorneys for the parties shall confer with respect to the issues raised by the motion in advance of hearing for the purpose of stipulating to relevant facts as the value of the property, and to the extent and validity of any security instrument.

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served a copy of the within Notice and Motion upon

_____
_____

on _____   By:_____
           (Date of service)   **(Describe Mode of Service)**

Executed on _____
                     (Date)

                                                    _____
                                                                      SIGNATURE